

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of Telecommunications and Energy on its own Motion, pursuant to G.L. c. 159, §§ 12 and 16, into the regulations, practices, equipment, appliances, and service of Network Plus, Inc.

D.T.E. 02-15

MOTION OF COUNSEL TO APPEAR *PRO HAC VICE*

The undersigned counsel respectfully moves for leave to appear *Pro Hac Vice* in the above-captioned proceeding. The undersigned counsel is a member in good standing of the New Jersey, New York, and District of Columbia Bars.

Respectfully submitted,

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Dated: February 21, 2002

CERTIFICATE OF SERVICE

On this 21st day of February 2002, I hereby certify that copies of the foregoing Letter from Karen Nations of XO Massachusetts, Inc., to Mary L. Cottrell, Secretary, Department of Telecommunications & Energy (February 8, 2002), Motion for Leave to Intervene as a Party, and Motion of Counsel to Appear *Pro Hac Vice* filed in Docket D.T.E. 02-15 were sent via Federal Express.

Karen Nations